## IN THE UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

CTP INNOVATIONS, LLC,	)
Plaintiff,	)
v.	) CIVIL ACTION FILI ) NO3:14-1733-TLW
PROFESSIONAL PRINTERS, INC.,	)
Defendant.	) ) )

## PLAINTIFF'S RESPONSES TO INTERROGATORIES PURSUANT TO LOCAL CIVIL RULE 26.01 DSC

COMES NOW Plaintiff CTP Innovations, LLC ("CTP") or ("Plaintiff") and hereby files their responses to the Court's Interrogatories pursuant to Local Civil Rule 26.01 DSC as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

## **RESPONSE**: N/A.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**RESPONSE**: All claims should be tried to a jury. Questions of fact exist with respect to each claim that should properly be determined by a jury rather than the Court.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock: (2) each publicly-owned company of which it is a parent and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

<u>**RESPONSE**</u>: Plaintiff is a limited liability company, Plaintiff is wholly-owned by Media Innovations, LLC. No publicly held company owns 10% or more of CTP's stock.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

**RESPONSE**: Plaintiff filed this action in the Columbia Division because the Defendant transacts business in Richland County, and a substantial portion of the events giving rise to the claims at issue occurred within this division.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

**RESPONSE:** There are no related actions, civil or criminal, filed in this district.

Respectfully submitted on April 30, 2014.

BAKER, DONELSON, BEARMAN CALDWELL & BERKOWITZ, PC

/s/ Brent B. Young

Brent B. Young FED ID No. 10140 100 Med Tech Parkway, Suite 200 P.O. Box 3038 Johnson City, TN 37602

Phone: 423-928-0181 Fax: 423-979-7654

Email: byoung@bakerdonelson.com

## Of Counsel:

BAKER, DONELSON, BEARMAN, CALDWELL& BERKOWITZ, P.C.

Samuel F. Miller, TN BPR No. 22936 Maia T. Woodhouse, TN BPR No. 30438 Baker Donelson Center 211 Commerce Street, Suite 800 Nashville, Tennessee 37201 Telephone: (615) 726-5594

Fax: (615) 744-5594

Email: smiller@bakerdonelson.com

Email: mwoodhouse@bakerdonelson.com

Attorneys for CTP Innovations, LLC